

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE  
OPINIONS OF KALIOPI PANAGOS, PHARM.D., R.Ph.**

**PLEASE TAKE NOTICE** that on July 5, 2022, or as soon thereafter as counsel may be heard, the undersigned Defendants' Executive Committee counsel, on behalf of the undersigned Defendants, shall move for an entry of Order excluding the opinions of Plaintiffs' expert, Kaliopi Panagos, Pharm.D., R.Ph., pursuant to Federal Rules of Evidence 104, 403, 702, and 703.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter and the Certification of Victoria Davis Lockard, Esq. together with exhibits; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: May 3, 2022

Respectfully submitted:

By: /s/ Victoria Davis Lockard  
Victoria Davis Lockard

GREENBERG TRAURIG, LLP  
Lori G. Cohen  
Victoria Davis Lockard  
Steven M. Harkins  
Terminus 200  
3333 Piedmont Road, N.E., Ste. 2500  
Atlanta, Georgia 30305  
Tel.: (678) 553-2100  
Fax: (678) 553-2386  
CohenL@gtlaw.com  
LockardV@gtlaw.com  
HarkinsS@gtlaw.com

*Attorneys for Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC*

SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Jessica D. Miller, *Liaison Counsel for Manufacturer Defendants*  
Nina R. Rose  
1440 New York Ave., N.W.  
Washington, D.C. 20005  
Tel.: (202) 371-7000  
Fax: (202) 661-0525  
jessica.miller@skadden.com  
nina.rose@skadden.com

*Attorneys for Zhejiang Huahai*

*Pharmaceutical Co, Ltd., Huahai  
U.S., Inc., Prinston Pharmaceutical  
Inc., and Solco Healthcare US, LLC*

PIETRAGALLO GORDON  
ALFANO BOSICK & RASPANTI,  
LLP  
Clem C. Trischler  
Jason M. Reefer  
Frank H. Stoy  
38th Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219  
Tel.: (412) 263-2000  
Fax: (412) 263-2001  
[cct@pietragallo.com](mailto:cct@pietragallo.com)  
[jmr@pietragallo.com](mailto:jmr@pietragallo.com)  
[rhs@pietragallo.com](mailto:rhs@pietragallo.com)

*Attorneys for Mylan Laboratories,  
Ltd. and Mylan Pharmaceuticals, Inc.*

KIRKLAND & ELLIS LLP  
Devora W. Allon  
Alexia R. Brancato  
601 Lexington Avenue  
New York, New York 10022  
Tel.: (212) 446-5967  
Fax: (212) 446-6460  
[devora.allon@kirkland.com](mailto:devora.allon@kirkland.com)  
[alexia.brancato@kirkland.com](mailto:alexia.brancato@kirkland.com)

*Attorneys for Torrent  
Pharmaceuticals Ltd. and Torrent  
Pharma Inc.*

LEWIS BRISBOIS BISGAARD &  
SMITH LLP  
Walter H. Swayze, III  
Andrew F. Albero

550 E. Swedesford Road, Suite 270  
Wayne, Pennsylvania 19087  
Tel.: (215) 977-4100  
Fax: (215) 977-4101  
[Pete.Swayze@lewisbrisbois.com](mailto:Pete.Swayze@lewisbrisbois.com)  
[Andrew.Albero@lewisbrisbois.com](mailto:Andrew.Albero@lewisbrisbois.com)

*Attorneys for Camber  
Pharmaceuticals, Inc.*

MORGAN, LEWIS & BOCKIUS  
LLP  
John P. Lavelle, Jr.  
1701 Market Street  
Philadelphia, Pennsylvania 19103  
Tel.: (215) 963-5000  
Fax: (215) 963-5001  
[john.lavelle@morganlewis.com](mailto:john.lavelle@morganlewis.com)

John K. Gisleson  
One Oxford Centre, Thirty-Second  
Floor  
Pittsburgh, Pennsylvania 15219  
Tel.: (412) 560-3300  
Fax: (412) 560-7001  
[john.gisleson@morganlewis.com](mailto:john.gisleson@morganlewis.com)

*Attorneys for Aurobindo Pharma Ltd.,  
Aurobindo Pharma USA, Inc., and  
Aurolife Pharma LLC*

HILL WALLACK LLP  
Eric I. Abraham  
William P. Murtha  
21 Roszel Road  
P.O. Box 5226  
Princeton, New Jersey 08543-5226  
Tel.: (609) 734-6358  
Fax: (609) 452-1888

[eabraham@hillwallack.com](mailto:eabraham@hillwallack.com)  
[wmurtha@hillwallack.com](mailto:wmurtha@hillwallack.com)

*Attorneys for Hetero Drugs, Ltd. and  
Hetero Labs Ltd.*

HARDIN KUNDLA MCKEON &  
POLETTO  
Janet L. Poletto, Esq.  
Robert E. Blanton, Jr., Esq.  
673 Morris Ave.  
Springfield, New Jersey 07081  
Tel.: (973) 912-5222  
Fax: (973) 912-9212  
[jpoletto@hkmpp.com](mailto:jpoletto@hkmpp.com)  
[rblanton@hkmpp.com](mailto:rblanton@hkmpp.com)

*Attorneys for Hetero USA Inc.*

CROWELL & MORING  
Andrew D. Kaplan  
Daniel T. Campbell  
Marie S. Dennis  
1001 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Tel.: (202) 624-1000  
Fax: (202) 628-5116  
[akaplan@crowell.com](mailto:akaplan@crowell.com)  
[dcampbell@crowell.com](mailto:dcampbell@crowell.com)  
[mdennis@crowell.com](mailto:mdennis@crowell.com)

*Attorneys for Cardinal Health, Inc.*

ULMER & BERNE LLP  
Jeffrey D. Geoppinger  
312 Walnut Street, Suite 1400  
Cincinnati, Ohio 45202-2409  
Tel.: (513) 698-5038  
Fax: (513) 698-5039

jgeoppinger@ulmer.com

*Attorneys for AmerisourceBergen  
Corporation*

NORTON ROSE FULBRIGHT US  
LLP  
D'Lesli M. Davis  
Ellie K. Norris  
2200 Ross Avenue, Suite 3600  
Dallas, Texas 75201-7932  
Tel.: (214) 855-8221  
Fax: (214) 855-8200  
[Dlesli.davis@nortonrosefulbright.com](mailto:Dlesli.davis@nortonrosefulbright.com)  
[Ellie.norris@nortonrosefulbright.com](mailto:Ellie.norris@nortonrosefulbright.com)

*Attorneys for McKesson Corporation*

**CERTIFICATE OF SERVICE**

I, Kate Wittlake, an attorney, hereby certify that on May 3, 2022, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

*/s/ Kate Wittlake*  
Kate Wittlake